

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PROGRESSIVE NORTHERN INSURANCE  
COMPANY.

Plaintiff,

-against-

**DEMAND FOR VERIFIED**  
**BILL OF PARTICULARS**  
CIV NO.: 07CV4033 (CLB)

DANIEL BELTEMPO, FRANCINE BELTEMPO,  
PAMJAM, INC., JILCO EQUIPMENT LEASING  
COMPANY, INC., DANA'S PRO TRUCKING INC.,  
TRAILMOBILE CORP., TRAILMOBILE PARTS AND  
SERVICE CORP., THERMO KING CORP.,  
INGERSOLL-RAND CO., LTD., and THERMO KING  
CORP., A UNIT OF INGERSOLL-RAND COMPANY  
LTD.,

Defendants.

-----X

S I R S :

PLEASE TAKE NOTICE that the defendants, **Trailmobile Parts & Service Corporation and Trailmobile Corporation**, by their attorney LAW OFFICE OF LORI D. FISHMAN, hereby demand(s) that a Verified Bill of Particulars be served in response to the following:

1. Set forth the names, addresses and policy number of any insurance companies issuing policies to **Trailmobile Parts & Service Corporation and Trailmobile Corporation** for the underlying action.
2. Set forth to whom and when notice was given in the underlying action to **Trailmobile Parts & Service Corporation and Trailmobile Corporation** by or on behalf of the plaintiff herein..
3. If oral, a description of the demand made upon the defendants, **Trailmobile Parts & Service Corporation and Trailmobile Corporation**, for defense and indemnification in the underlying action;
  - a. The date of the demand;
  - b. The identity of the party upon whom the demand was made;
  - c. The particulars of the demand; and
  - d. The policies under which the demand was made.

DATED: Tarrytown, New York  
July 5, 2007

Yours etc.,

LAW OFFICE OF LORI D. FISHMAN

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GEORGE R. DIETER (GRD 0268)

**Attorney for Defendants**  
**Trailmobile Corporation and**  
**Trailmobile Parts & Service**  
**Corporation**

303 South Broadway, Suite 435  
Tarrytown, NY 10591  
(914) 524-5600  
File # 107220081

TO: BURATTI, KAPLAN MCCARTHY & MCCARTHY  
**Attorney for Plaintiff**  
One Executive Boulevard - Suite 280  
Yonkers, NY 10701  
(914) 378-3900

BAUMAN, KUNKIS & OCASCIO-DOUGLAS, P.C.  
Attorney for Defendants  
**Daniel Beltempo & Francine Beltempo**  
225 West 34th Street  
New York, NY 10122  
212-564-3555

KENNY SHELTON LIPTAK NOWAK, LLP  
Attorney for Defendant  
**Dana's Pro Trucking, Inc.**  
14 Lafayette Square Suite 510  
Buffalo, NY 14203  
716-853-3801

DONOHUE & PARTNERS, P.C.  
Attorney for Defendant  
**Pamjam, Inc.**  
90 Broad Street, Suite 1502  
New York, NY 10004  
212-972-5252

BARRY, MCTIERNAN & MOORE, ESQS.  
Attorney for Defendant  
**Jilco Equipment Leasing Company, Inc.**  
55 Church Street, Suite 205  
White Plains, NY 10601  
914-946-1030

PORZIO, BROMBERG & NEWMAN, P.C.

Attorney for Defendants

**Thermo King Corp., Ingersoll-Rand Co., Ltd.and**

**Thermo King Corp., A Unit of Ingersoll-Rand Company, Ltd.**

156 West 56th Street Suite 803

New York, NY 10019-3800

212-265-6888

[illegible]

PAMELA M. HYLAND, being duly sworn deposes and says:

I am not a party to this action. On July 5, 2007, I am over the age of 18 years. I served the annexed **DEMAND FOR VERIFIED BILL OF PARTICULARS** upon the attorneys and/or parties listed below by depositing a true copy of the same into the care of the U.S. Postal Service within the State of New York directed to the said attorneys and/or parties as follows:

BURATTI, KAPLAN MCCARTHY & MCCARTHY  
**Attorney for Plaintiff**  
One Executive Boulevard - Suite 280  
Yonkers, NY 10701

BAUMAN, KUNKIS & OCASCIO-DOUGLAS, P.C.  
Attorney for Defendants  
**Daniel Beltempo & Francine Beltempo**  
225 West 34th Street  
New York, NY 10122

KENNY SHELTON LIPTAK NOWAK, LLP  
Attorney for Defendant  
**Dana's Pro Trucking, Inc.**  
14 Lafayette Square Suite 510  
Buffalo, NY 14203

**DONOHUE & PARTNERS, P.C.**  
Attorney for Defendant  
**Pamjam, Inc.**  
90 Broad Street, Suite 1502  
New York, NY 10004

**BARRY, MCTIERNAN & MOORE, ESQS.**  
Attorney for Defendant  
**Jilco Equipment Leasing Company, Inc.**  
55 Church Street, Suite 205  
White Plains, NY 10601

PORZIO, BROMBERG & NEWMAN, P.C.  
Attorney for Defendants  
**Thermo King Corp., Ingersoll-Rand Co., Ltd. and  
Thermo King Corp., A Unit of Ingersoll-Rand Company, Ltd.**  
156 West 56th Street Suite 803  
New York, NY 10019-3800

such being the address(es) previously designated for that purpose in the preceding papers in this action or being the last known address for that person. Such service was done in full conformance with Rule 2103 of the CPLR.

Sworn to Before Me On  
July 5, 2007

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PAMELA M. HYLAND

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PROGRESSIVE NORTHERN INSURANCE  
COMPANY.

Plaintiff,

-against-

07CV4033 (CLB)

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PAMJAM, INC., JILCO EQUIPMENT LEASING  
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LTD.,

Defendants.

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**DEMAND FOR VERIFIED BILL OF PARTICULARS**

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**LAW OFFICE OF LORI D. FISHMAN**

Attorney for Defendant(s)  
303 South Broadway, Suite 435  
Tarrytown, N.Y. 10591  
(914) 524-5600

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By: \_\_\_\_\_  
George R. Dieter

=====

TO:

Service of a copy of the within is  
hereby admitted:

DATED: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Attorney(s) for

=====

PLEASE TAKE NOTICE:

**NOTICE OF ENTRY**

that the within a (certified) true copy of an  
duly entered in the office of the clerk of the within named court on

**NOTICE OF SETTLEMENT**

that an \_\_\_\_\_, of which the within is a true copy, will be presented for settlement to the  
Hon. \_\_\_\_\_, one of the judges of the within named Court, at \_\_\_\_\_,  
on \_\_\_\_\_, at \_\_\_\_\_.

DATED:

Yours, etc.,  
LAW OFFICE OF LORI D. FISHMAN